



Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Clean Air Act Full Compliance Evaluation Inspection Report

J & J Auto Body, Inc.
Pocatello, ID 83206

Inspection Date: July 18, 2022

Report Author Signature

Date

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Date

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Attachments

Attachment 1.....Idaho Air Quality Compliance Inspection, Preliminary Inspection Findings

1. Basic Facility and Inspection Information

Facility: J & J Auto Body, Inc.
2610 Garrett Way
Pocatello, ID 83206

AFS/FRS Number: Not available

State Facility ID: 005-00076

SIC: 7532 Top, Body, and Upholstery Repair Shops and Paint Shops

NAICS: 811121 Automotive Body, Paint, Interior Repair and Maintenance

Permit Number: Idaho Permit to Construct No. P-2011.0035, dated February 10, 2011

Facility Contacts: Roy Hall
Owner
J & J Auto Body, Inc.
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Inspectors: Bryan Lange
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Pocatello Regional Office
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Date of Inspection: July 18, 2022

Inspection Start/End Times: July 18, 2022, 1:10 pm – 2:20 pm MST

Inspection Notice: This was an announced inspection.

Mr. Lange notified Mr. Hall, by phone on July 14, 2022.

This was a Clean Air Act (CAA) compliance inspection by an Environmental Protection Agency (EPA) Contractor. Inspector Mr. Lange, with Eastern Research Group, led the inspection. The state air agency was made aware of the inspection beforehand and participated in the inspection. The purpose was to identify potential compliance concerns with CAA regulations, specifically to gather information to determine if the facility is in compliance with the Permit to Construct (PTC) and the National Emission Standards for Hazardous Air Pollutants (NESHAP) subpart HHHHHH (Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources).

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

1. Facility/Process Description:

The following facility description is based on information provided by a facility representative in the opening conference as well as information found on-file regarding permits and prior inspections.

J & J Auto Body, Inc. is a refinishing operation that repairs and paints automobiles. It has two 24-foot-wide paint booths; one downdraft booth and one with a curtain. The facility does not paint complete cars, but repairs panels damaged in a collision. The emission sources located at the facility included the following:

- Mixing room,
- Spray booths,
- Spray guns,
- Spray gun cleaning equipment,
- Paint storage area, and
- Spray booth heater.

2. Compliance History

On April 27, 2018, Idaho Department of Environmental Quality (DEQ) conducted an on-site inspection and the facility was found in compliance at the time of the inspection.

J & J Auto Body, Inc. is not registered in EPA's ECHO as of the date of this report.¹

3. Records Review Prior To The Inspection

Prior to inspection, Idaho DEQ shared copies of these items and each was reviewed:

- February 10, 2011 - PTC No. P-2011.0035 and statement of basis.

¹ See <https://echo.epa.gov/>

- April 27, 2018 - Idaho inspection report documenting an on-site inspection.

a. Entry and Opening Conference

Mr. Lange and Mr. Aytes (“the inspectors”) arrived at the facility at approximately 1:10 pm MST on July 18, 2022. They entered the customer lobby and met with Mr. Hall. The inspectors presented identification cards and explained that they were at the facility to conduct a CAA inspection. The opening conference included a discussion of operations.

The inspectors explained that the inspection would consist of a review of the PTC conditions followed by a walk-through where records will be reviewed.

The inspectors also explained that following the walk-through, Idaho DEQ will leave the facility with a carbon copy of an Air Quality Compliance Inspection - Preliminary Inspection Findings Form (PIFF) documenting the inspection details and Mr. Aytes will keep the original.

Mr. Hall volunteered information about J & J Auto Body, Inc. surface coating activities, specifically that they use an ultraviolet cured primer surfacer which still contains VOC.

4. Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (NESHAP Subpart 6H)

Mr. Hall indicated that the coating materials used on-site do not contain the Subpart HHHHHH target HAP (i.e., compounds of chromium, lead, manganese, nickel, or cadmium) and rule does not apply. Nonetheless, J & J Auto Body, Inc. follows the general compliance requirements of the NESHAP. Specifically, Mr. Hall was able to demonstrate that all painters were trained in the proper application of surface coatings. All training records were accessible through a software package EnviroSAFE. Mr. Hall explained that high volume-low pressure (HVLP) paint guns are used for all applications of coatings.

Using the EnviroSAFE software, Mr. Hall produced SDS sheets for common coatings. Neither silicon dioxide nor the Subpart HHHHHH target HAP were present in a measurable quantity.

5. Permit to Construct Conditions

To determine if the facility is in compliance with the VOC and PM₁₀ emission limits included in the PTC the inspectors reviewed paint consumption records and discussed spray booth filter system maintenance procedures.

Compliance with VOC emission limits are demonstrated with the coating material use limit. Specifically, the use rates shall not exceed 4.0 gallons per day for all coating materials. Mr. Hall provided paint consumption totals for two random dates chosen by the inspectors. These totals show that coating use on these days was below the 4.0 gallons per day operational requirement.

	7/1/19	8/20/2020
Total daily paint consumption (gallons)	0.55	2.5

Mr. Hall explained the paint booth floor exhaust filter replacement procedures. The glass fiber exhaust filters are replaced every 3-weeks. The filter media comes from the manufacture in a roll, and it is cut to size. Mr. Hall explained consistent flow is necessary for a quality finish on the automobiles. The inspectors affirmed that 98 percent control efficiency is achievable. These glass fiber filters are identical to the type used at other autobody shops where manufacture guarantees were available.

6. Facility Walk-Through and On-Site Records Review

At approximately 1:45 pm MST, the inspectors were escorted to the automobile paint and repair area.

The inspectors observed that each paint gun used for the applications of coatings were HVLP. Mr. Hall indicated that each paint booth contained a natural gas fired heater and the total heat input capacity all space heaters was less than 10 MMBtu/hr.

The walk-through ended at approximately 2:10 pm MST.

7. Closing Conference

At approximately 2:15 pm MST, the inspectors held a closing conference. Mr. Lange led the closing conference and summarized the exemption permit conditions and records observed by the inspectors. Mr. Lange went through his inspection notes and described two ways that recordkeeping could be improved.

1. Calculating a daily coating volume was difficult because the EnviroSAFE software tracks coating usage in quarts, by the job, and coating type (e.g., primer, topcoat). It was recommended that changes be made to the software such that compliance with the daily volumes operational requirements can be demonstrated and are actively managed.
2. No documentation of the spray booth filters system performance was available. Mr. Hall should collect and retain this performance information from the filters manufacturer.

Mr. Lange explained that J & J Auto Body, Inc. has an option to submit a NESHAP Subpart 6H petition for exemption to EPA. Once this petition has been accepted by EPA then the related compliance activities (e.g., training required under the NEHAP) will no longer be required.

Mr. Aytes presented Mr. Hall with carbon copy of an Idaho DEQ Air Quality Compliance Inspection PIFF documenting inspection details and preliminary status of in-compliance at the time of the inspection.

The inspectors departed the facility at 2:20 pm MST.

J & J Auto Body, Inc., Pocatello, ID

There are no post inspection activities related to the July 18, 2022, inspection.